

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Tonya Renee Pickens, Debtor**

**Case No. 25-50123-KMS  
CHAPTER 13**

**NOTICE**

Debtor has filed papers with the court to Modify their Chapter 13 Bankruptcy Plan.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to amend the Plan, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk  
U.S. Bankruptcy Court  
Dan M. Russell, Jr., U.S. Courthouse  
2012 15th Street, Suite 244  
Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Modify Plan.

Date: April 28, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer Ann Curry Calvillo (MSBN 104367)  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Tonya Renee Pickens, Debtor**

**Case No. 25-50123-KMS  
CHAPTER 13**

**MOTION TO MODIFY BANKRUPTCY PLAN**

COMES NOW, Debtor, by and through counsel, and moves this Court to modify their Chapter 13 plan, and in support thereof, would show the Court as follows:

1. Debtor commenced this case on January 30, 2025 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Gulfco of Mississippi, LLC filed its Proof of Claim (#12) on April 9, 2025, in the amount of \$1,669.92.
3. Debtors wish to modify the Confirmed Plan to provide payment of the debt owed to Gulfco of Mississippi, LLC pursuant to the claim filed with the Court plus 10% interest.
4. Notwithstanding the increase in the monthly payment amount, the Confirmed Plan provisions regarding the distribution to unsecured creditors should remain unchanged.
5. The Chapter 13 Trustee should retain discretion to issue a wage order or otherwise increase the payment amount of the Modified Payment if the Trustee determines such increase is necessary to pay the priority and secured claims as ordered in the confirmed plan.
6. Except as expressly modified herein, all other terms of the Confirmed Plan should remain unchanged and in full force and effect.

7. Debtor wishes for the Trustee to cure any deficiency including ongoing mortgage payments paid through the plan, if one exists, and adjust the wage order as needed.

WHEREFORE, Debtor prays that their Bankruptcy Plan be modified to reflect the above-mentioned changes and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:

Thomas C. Rollins, Jr.  
Jennifer Ann Curry Calvillo  
The Rollins Law Firm, PLLC  
P.O Box 13767  
Jackson, MS 39236  
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Modify Plan was forwarded on April 29, 2025, to:

By USPS First Class Mail, Postage Prepaid:

Gulfco of Mississippi, LLC  
P.O. Box 320001  
Flowood, MS 39232

Gulfco of Mississippi, LLC  
c/o John E. Tucker  
406 Liberty Park Court  
Flowood, MS 39232

By Electronic CM/ECF Notice:

David Rawlings

U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Tonya Renee Pickens

CASE NO: 25-50123

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 13

On 4/29/2025, I did cause a copy of the following documents, described below,  
Notice and Motion to Modify Plan

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 4/29/2025

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401  
601 500 5533  
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Tonya Renee Pickens

CASE NO: 25-50123

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 13

On 4/29/2025, a copy of the following documents, described below,

Notice and Motion to Modify Plan

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 4/29/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

GULFCO OF MISSISSIPPI, LLC  
P.O. BOX 320001  
FLOWOOD MS 39232

FIRST CLASS

GULFCO OF MISSISSIPPI, LLC  
C/O JOHN E. TUCKER  
406 LIBERTY PARK COURT  
FLOWOOD MS 39232